

Hearing Statement

Matter 3 – The Housing Requirement

November 2025

Representor: The Cooper Family

Representor ID: A18

Site: Land at Toy Farm, Euxton

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1. Introduction

- 1.1 This Hearing Statement relates to Matter 3 and is submitted by The Cooper Family, who have submitted consultation responses at each consultation stage.
- 1.2 The Cooper Family are participating in the Examination process as they are promoting land at Toy Farm in Euxton. A Development Statement related to the merits of the site in the context of the need to identify additional housing sites in order to meet housing needs in full was provided at Appendix 1 to their Regulation 19 consultation response.
- 1.3 The Development Statement confirms that the land at Toy Farm is deliverable and a sustainable location towards which new homes should be directed.
- 1.4 We trust that this Statement assists the Inspectors in respect of the Examination.

2. Issue 3 - Is the identified housing requirement justified and consistent with national policy?

Q3.1 Is the housing requirement of 23,652 homes during the 2023 – 2041 period (policy HS1) and a figure of 1,314 per annum (dpa), justified by the Council's evidence? Are the assumptions of the 2024 Housing and Economic Development Needs Assessments and Addenda (Doc HO10, HO11 and HO12) soundly based, particularly in relation to:

2.1 The Cooper family do not consider that the Plan's housing requirement of 23,652 homes (2023–2041), equating to 1,314 dpa, is sufficiently justified by the supporting evidence base. The 2024 Housing and Economic Needs Assessment (HENA) and its Addenda (Docs HO10, HO11, HO12) underpin this figure, but several assumptions are questionable, as set out in our response to parts a), b), c) and d) of Q3.1 below.

a) Identifying a baseline figure

2.2 The HENA identified a baseline housing need using the Government's standard method. By the time of submission, this baseline local housing need (LHN) was approximately 1,643 dpa across Central Lancashire. For Chorley specifically, the HENA Update 2024 (HO10) states 564 dpa as the current LHN (incorporating household projections and affordability adjustment). This 564 dpa is significantly higher than the Plan's proposed 334 dpa requirement for Chorley. Rather than adopt the baseline, the Councils have consciously chosen a lower figure.

2.3 While the transitional arrangements set out in the NPPF (paragraph 78c) allow a minimum 80% of LHN, the Plan's baseline should still be recognised as 1643 dpa. By establishing a housing requirement of 1,314 dpa, the Plan is immediately 20% below the known minimum housing need for Central Lancashire. There is no exceptional local circumstance (such as major constraints or unmet need absorption issues) that justifies deviating downward from the baseline by such a degree. In fact the opposite is true as Central Lancashire has considerable development opportunities in sustainable locations.

2.4 The baseline evidence therefore suggests the housing requirement should be higher, not lower. The Cooper family consider the baseline LHN, as calculated by the December 2024 standard method, to be the appropriate starting point for a sound plan, yet the Plan does not meet that baseline. This calls into question whether the Plan can be considered to be positively prepared.

b) Forecasts for economic growth;

2.5 The Plan's 1,314 dpa figure was derived from an "employment-led" scenario in the HENA Addendum. We understand that Cambridge Econometrics job growth forecasts were used, which produced a housing need of roughly the same magnitude once adjusted. However, critically, the Councils then "uplifted" the jobs-led number slightly to hit the 80% LHN threshold, which resulted in the 1,314dpa housing requirement (80% of 1,643dpa). The

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evidenced economic scenario was reverse-engineered to meet a ‘policy-on’ scenario (to pursue 80% of LHN in accordance with the transitional requirements). This undermines the credibility of the evidence base as it relates to economic growth. If Central Lancashire is planning for ambitious economic growth (and evidence suggests it should, as set out in the Lancashire Growth Deal and City Deal investments for example), one would expect a higher housing requirement, possibly even above the baseline.

- 2.6 The BE Group Employment Land Study 2024 identifies a need for 173 ha employment land, implying robust job growth. Yet the housing requirement is suppressed. In short, the economic-led approach in HO10–12 was not used to increase the housing number (as would be expected for a growth scenario), but rather to justify a decrease. We consider that to be an unsound when preparing the Plan. The forecasts themselves may be sound, but the way they were applied, effectively capping housing growth, is not consistent with the NPPF’s aim to integrate housing and economic strategies positively.

c) Alignment of jobs and workers; and

- 2.7 The misalignment between where jobs are created and where workers are housed is a fundamental concern. The Plan effectively reallocates a portion of Chorley’s housing need to Preston (and to a lesser extent South Ribble). The approach assumes that some of Chorley’s population will live in new homes in Preston. However, Chorley’s housing market is distinct – many who work in Chorley (or who wish to live there for family / quality of life reasons) will not simply move to Preston. Redistributing need in this way can lead to longer commutes and unsatisfied housing demand in Chorley.

- 2.8 The Council’s justification (Plan paragraphs 4.11–4.21) claims that because Preston has more urban capacity and Chorley is constrained by Green Belt, shifting growth is deemed to be an acceptable approach. We fundamentally disagree. Sustainability is best served by providing homes near to where needs arise and where jobs are located, not by forcing residents to travel 10–15 miles potentially car which is an unsustainable mode of travel. The current approach would likely exacerbate commuting flows from Chorley to Preston (or vice versa), which conflicts with the NPPF’s goal of reducing the need to travel.

- 2.9 In summary, a soundly-based plan would ensure each borough’s housing requirement aligns with its own economic growth and workforce needs, with minimal export of housing need then occurring as a result. The Plan fails in this respect by leaving Chorley’s need partially unmet.

d) Assumptions of housing requirements arising from economic growth?

- 2.10 The employment-led housing need calculation involves assumptions about economic participation, unemployment rates, and in-migration of workers. We are concerned that these assumptions may be optimistic in terms of constraining housing need. For example, if the economic forecasts assume a rise in economic activity or that new jobs will be filled without substantial net in-migration, the housing needed for those jobs could be understated.

- 2.11 Additionally, the Plan assumes that by providing 1,314 dpa, all three authorities together will support the forecast job growth. If job growth turns out higher (e.g. due to the Samesbury Enterprise Zone expansion or other investments in Lancashire's economy), the housing requirement is not future-proofed – it is simply restricted to a minimum. The housing requirement figure of 1,314 dpa is exactly 80% of the LHN, which suggests the number was policy-driven. This is a 'policy-on' choice that is being presented as an evidence base outcome. Such an approach is not consistent with the spirit of national policy, which, even under transitional arrangements, expects plans to be aspirational and meet as much identified need as possible.
- 2.12 The Cooper family view is that the housing requirement should have been set closer to (or even in excess of) the full objectively assessed need (1,643 dpa), especially given the ambitious economic aspirations for the area at the heart of Lancashire. The evidence does not convincingly show that 1,314 dpa is enough to both meet demographic needs and support the economic growth targeted, – in fact, evidence points to the contrary.

Q3.2 How were the housing requirements of each authority arrived at? Will the proposed requirements adequately address the needs of each authority? Is the Plan sufficiently clear in relation to how a failure to supply housing in one authority will impact upon the other two authorities in relation to five year housing land supply?

- 2.13 The submitted Plan distributes the 1,314 dpa requirement between the councils as 334 dpa for Chorley, 460 dpa for South Ribble, 520 dpa for Preston under Policy HS1. This distribution is not effective in addressing the needs of each authority and seem to originate from the now-abandoned standard method distribution from the 2020 Memorandum of Understanding, which tilted more growth towards Preston. Chorley's 334 dpa is only 59% of its current LHN (564 dpa), whereas Preston's 520 dpa equates to 88% of its LHN (590 dpa) and South Ribble's 460 dpa is 94% of its LHN (489 dpa).
- 2.14 Considering the above, nearly all of the 20% shortfall was taken from Chorley's housing needs (a reduction of 230 dpa for Chorley vs reductions of 70 dpa in Preston and 29 dpa in South Ribble. The Plan's own evidence base (Housing Topic Paper) acknowledges that Chorley has the highest affordability pressures and baseline need. Yet the Plan has chosen to apportion the lowest housing need figure to Chorley. This was a policy-driven reallocation of housing need away from Chorley to Preston. The decision-making behind this is not documented transparently. It likely was influenced by the availability of large urban sites in Preston (e.g. at North West Preston, inner urban sites, etc.) and a desire to avoid difficult Green Belt decisions in Chorley.
- 2.15 We do not therefore see a robust evidence-based rationale for the specific housing distribution that has been derived and it means that Chorley will not meet its own housing needs within its borough meaning that the Plan cannot be considered to be positively prepared.

Q3.3 In relation to Affordable Housing Needs, is the identified need for 438 dpa based on robust, up-to-date information? How has this been considered in the overall housing requirement?

- 2.16 The identified affordable housing need of 438 units per annum (across Central Lancashire as a whole) has been derived from the 2022 / 24 Housing Needs and Demand Assessments (HNDAs), which we consider robust and up-to-date. However, the Plan's housing requirement fails to accommodate this need in full, especially in Chorley.
- 2.17 The Chorley HNDA (2024) found that 162 affordable homes per annum are needed in Chorley alone. For Preston and South Ribble, the combined need is around 276 per annum (438 total). Under Policy HS7, most developments will deliver 30% affordable housing. With Chorley only planning for 334 total dpa, even a full 30% yield on every site would deliver approximately 100 affordable units/year in Chorley. That is an annual shortfall of 62 affordable homes in Chorley, or 1,116 homes over the plan period that will not be provided for those in need. In other words, by constraining Chorley's overall housing number, the Plan knowingly prevents a significant portion of identified affordable need to go unmet. This undermines the soundness of the Plan as it cannot be considered to be positively prepared as it is not meeting the full affordable needs of Chorley residents.
- 2.18 The Cooper family argue that the overall housing requirement should have been uplifted to account for affordable housing delivery. The NPPF allows consideration of an uplift where it could help deliver the number of affordable homes required. Here, using the full standard method number for Chorley (564 dpa) would produce c.169 affordable units per year at the 30% policy requirement, almost exactly meeting Chorley's 162 per annum need. This demonstrates that the principal reason affordable needs won't be met is the artificially low housing target, not inherent market capacity. In our view, this is a clear case where the Plan is not justified as it knowingly falls short of an identified need when an alternative (higher housing provision in Chorley) was available and evidenced. The Council's own affordable housing topic paper (TP06) likely acknowledges this shortfall.

Q3.4 Does the requirement adequately recognise the impact of housing need arising from strategic employment allocations and regional growth strategies? What assumptions have been made in relation to this?

- 2.19 The Plan's housing figure does not sufficiently account for the housing demand likely to arise from strategic employment allocations and ambitious regional growth initiatives. Central Lancashire is part of the Lancashire Economic Partnership and is benefiting from: the Preston, South Ribble and Lancashire City Deal, major employers such as BAE Systems at Samlesbury, logistics parks, the upcoming cyber and digital investments, and potentially the Lancashire Combined Authority's Growth Plan (2025–2035). These strategies aim to create thousands of new jobs across the region. If successful, they will draw workers of all skill levels into Central Lancashire.

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- 2.20 Yet the Plan's housing requirement was not visibly uplifted for these factors, rather it was reduced to 80% of identified need. This is contradictory to the premise of the City Deal (signed in 2013), which was predicated on accelerated housing growth to accompany infrastructure and job creation; Preston and South Ribble have delivered many homes under that arrangement, but Chorley too has a role (Buckshaw Village was part of earlier growth, and future phases around Chorley could also support City Deal objectives).
- 2.21 The Plan's housing requirement does not therefore adequately take account of the housing implications of its own strategic employment sites (Policies EC2–4) or the broader growth context that exists in Central Lancashire. The assumptions seem to be that job growth will neatly follow the chosen population growth, which is a 'policy-on' stance that should not be used to influence a suppressed housing requirement. The NPPF's advocates housing and economic strategies to positively align infrastructure, employment, and housing needs. The Cooper family contend that a soundly-based plan would be more aspirational in this regard, even adding a modest uplift or at least ensuring the full standard method need as a baseline is met, to help support economic objectives.

Q3.5 Does the figure take adequate account of the needs of elderly residents and specialist housing?

- 2.22 The Cooper family has no specific comments to make in relation to this question.

Q3.6 Should there be a housing requirement for designated neighbourhood areas identified within the Plan (paragraph 66 in the NPPF Dec 2023)? If so, what should this be?

- 2.23 The Cooper family has no specific comments to make in relation to this question.